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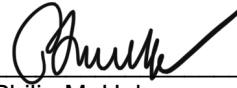
The Honorable Judge Philip M. Halpern, U.S.J.D.
U.S. District Court, Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Bynum v. Pasenti Inc, et al*
Case No.: 7:21-cv-04817-PMH

Application denied as moot.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 23.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
October 25, 2021

Dear Honorable Judge Halpern:

This law firm represents Defendants Pasenti Inc., Tri Mar Industries Inc., K.Je Construction Services Inc., and Martin Parenti (incorrectly sued herein as “Martin Pasenti”) (collectively, the “Defendants”) (collectively, the “Defendants”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 1(B) and 1(F), this letter respectfully serves to request an extension of Defendants’ time to reply or otherwise respond to Plaintiff’s Complaint to be extended through and including May 31, 2021.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel.¹ If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the undersigned counsel has recently been engaged [*see* Dckt. Nos. 21-22], and requires additional time to gather information from Defendants to respond to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel

¹ Plaintiff’s counsel’s consent was conditioned on an acknowledgement from Defendants to waive any defenses to personal jurisdiction due to improper service of process.